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Counsel for Plaintiff Davis

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

| | | |
|------------------------|---|----------------------------|
| CHARLIE J. DAVIS, JR., |) | |
| |) | |
| Plaintiff, |) | |
| vs. |) | Case No. A02-0214 CV (JKS) |
| |) | |
| ZELMER HYDEN, et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

**MOTION TO REOPEN OR EXTEND DISCOVERY
AND TO COMPEL PRODUCTION OF DOCUMENTS
AND ATTENDANCE OF WITNESS AT DEPOSITION**

Plaintiff Charlie Davis, through undersigned counsel, moves this court for an order extending discovery to allow additional document requests, and an additional deposition of witness Roger Hale. This motion is made because the need for this additional discovery was just discovered during depositions of the defendants, recently completed on April 28 and 29, 2006.

This motion is supported by the attached memorandum, affidavit and exhibits.

DATED this 19th day of May 2006, at Anchorage, Alaska.

MATTHEWS & ZAHARE, P.C.
Counsel for Plaintiff Davis

By: s/ Thomas A. Matthews
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CERTIFICATE OF SERVICE

I certify that on 19th day of May 2006
a copy of the foregoing document was
served by electronic mailing to:

Marilyn J. Kamm, Esq.
Assistant Attorney General
State of Alaska, Dept. of Law
Criminal Division Central Office
P.O. Box 110300
Juneau, AK 99811

s/Thomas A. Matthews